IN THE UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS

In Re:	)	**16-82923**
	)	**Chapter 13**
John Campanella	)	**Judge Thomas M. Lynch**
Debtor	)	
	)	**Hearing Date: February 17, 2017**
	)	**Hearing Time: 9:00 a.m.**

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **Friday, February 17, 2017 at 9:00 a.m.**, or as soon thereafter as counsel may be heard, we shall appear before the Honorable Thomas M. Lynch, United States Bankruptcy Judge, in Courtroom 3100, U.S. Courthouse, 327 South Church Street, Rockford, IL 61101 or any other Judge sitting in his stead, and shall then and there present ***Bolder Contractors, Inc.'s Motion for Order Deeming Project Receivables Not Property of the Estate,*** a copy of which is herewith served upon you.

WATT, TIEDER, HOFFAR & FITZGERALD LLP

By: /s/ *Lauren E. Rankins*

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CERTIFICATE OF SERVICE

The undersigned certifies that on February 10, 2017, she caused the foregoing ***Bolder Contractors, Inc.'s Motion for Order Deeming Project Receivables Not Property of the Estate*** to be electronically filed with the Clerk of the United States Bankruptcy Court, Northern District of Illinois, using the Court's CM/ECF system, which shall send notifications of such filing to all counsel of record. Parties may access this filing through the Court's CM/ECF system.

By: /s/ *Lauren E. Rankins*

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE: JOHN CAMPANELLA DEBTOR.	CHAPTER 13 CASE NO. 16-82923 **BOLDER CONTRACTOR INC.'S MOTION FOR ORDER DEEMING PROJECT RECEIVABLES NOT PROPERTY OF THE ESTATE**

Creditor Bolder Contractor's Inc. ("Bolder"), by and through its undersigned counsel, hereby submits this Motion for Order Deeming Project Receivables Not Property of the Estate. In support thereof, Bolder relies on its Memorandum of Points and Authorities filed contemporaneously herewith.

WHEREFORE, Creditor, Bolder Contractor's, Inc., respectfully requests that the Court issue an Order (i) deeming the Project Receivables not property of the estate and (ii) granting such other and further relief as the Court deems just and proper.

Dated: February 10, 2017

Respectfully Submitted,
WATT, TIEDER, HOFFAR & FITZGERALD LLP

By: */s/ Lauren E. Rankins*

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